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**Certified Mail
Return Receipt Requested**

June 7, 2010

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Re: TOP HAT PLAN EXEMPTION

Dear Sir/Madam :

Zurich North America
1400 American Lane
Schaumburg, Illinois
60196-1056

Pursuant to the provisions of 29 CFR §2520.104-23, you are hereby notified that Zurich American Insurance Company has adopted a new plan, the Zurich North America Supplemental Retirement Account Plan (the "Plan"), that it maintains primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees. The Plan is an unfunded deferred compensation plan eligible for the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, described in Section 2520.104-23 of the Department of Labor Regulations.

The following information is provided in accordance with Regulation Section 2520.104-23(b):

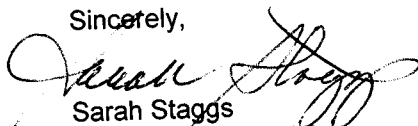
(1) Employer: Zurich American Insurance Company
(EIN: 36-4233459)
1400 American Lane
Schaumburg, IL 60196

(2) Participants: The approximate number of employees participating in the Plan is 19.

(3) Declaration: The Zurich American Insurance Company maintains the Zurich North America Supplemental Retirement Account Plan primarily for the purpose of providing deferred compensation solely for a select group of management or highly compensated employees.

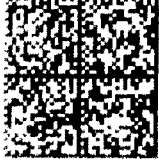
Kindly acknowledge receipt of this filing by signing and returning to the sender the enclosed copy of this statement, which is intended to serve as acknowledgment of receipt of this statement. A stamped, self-addressed envelope is enclosed for your convenience.

Sincerely,


Sarah Staggs
Head of Benefits N.A.



PRESORTED
FIRST CLASS



PT INET BOWNE

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MAILED FROM ZIP CODE 60735

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Washington, DC 20210

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